

EXHIBIT

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VIRGINIA:

IN THE CIRCUIT COURT OF THE CITY OF RICHMOND

K.B. BY HER MOTHER,
SAKIA HALL AS NEXT FRIEND,
and
SAKIA HALL

Plaintiffs,
vs.

Case No.:
CL10-3675-00

HAROLD FORD

Defendant.

DEPOSITION OF **K.B.**

May 20, 2011

1:40 P.M.

Taken at:

THE CITY ATTORNEY'S OFFICE
900 East Broad Street, Room 300
Richmond, Virginia 23219

REPORTED BY: HELEN B. YARBROUGH, RPR, CCR, CLR

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Richmond, Virginia 23233
(804) 359-1984

1 Q Yes?

2 A **Yes.**

3 Q Was it a bunch of them?

4 A **Yes.**

5 Q And as they were gathering around, was that
6 making you feel bad because you were being talked to
7 by the police officer?

8 A **Yes.**

9 Q It did? And did you talk louder?

10 A **No.**

11 Q What did you do?

12 A **Didn't say anything.**

13 Q Didn't say anything? Were you upset,
14 though?

15 A **Yes.**

16 Q Did you let him know that you were upset?

17 A **No.**

18 Q When you were at the doorway, did you try to
19 get away from Officer Ford?

20 A **Yes.**

21 Q Okay. What happened?

22 A **(Pause.)**

23 Q Did he keep you from getting away?

24 A **Yes.**

25 Q Okay. And did you try to hit him when he

1 tried to stop you from getting away?

2 **A No.**

3 Q Did you hit him?

4 **A No.**

5 Q Were you trying to get away from him?

6 **A Yes.**

7 Q Did you keep trying to get away from him?

8 **A Yes.**

9 Q Were you angry?

10 **A Yes.**

11 Q You let him know you were angry?

12 **A No.**

13 Q But you tried to get away from him?

14 **A Yes.**

15 Q Okay. Show me how you tried to get away.

16 Did you swing your arms, try to pull your arms away
17 from him?

18 **A Yes.**

19 Q Did you try to bite him, bite his hands?

20 **A No.**

21 Q Did you try to drop down to the ground?

22 **A Huh?**

23 Q Did you try to drop down to the ground to
24 get away from him?

25 **A No.**

1 Q After you were outside with Officer Ford,
2 did you keep trying to get away from him?

3 **A Yes.**

4 Q Okay. And did he say, "You need to stop or
5 I'm going to put the cuffs on you"?

6 **A Yes.**

7 Q And then did you keep trying to get away?

8 **A Yes.**

9 Q And then he put the cuffs on you?

10 **A Yes.**

11 Q And then he put you in the car?

12 **A Yes.**

13 Q Did he turn the air conditioner on and tell
14 you to calm down in the car?

15 **A (Witness shakes head in the negative.)**

16 Q Don't remember?

17 **A He said, "Calm down."**

18 Q He said, "Calm down"?

19 **A (Witness nods head in the affirmative.)**

20 Q Did you eventually calm down?

21 **A No.**

22 Q You didn't calm down?

23 **A I was trying to get out of the car.**

24 Q You were trying to get out of the car?

25 **A (Witness nods head in the affirmative.)**

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1 Q Is that "yes"?

2 A Yes.

3 Q Before you got out of the car, did you
4 eventually calm down?

5 A Yes.

6 Q Okay. And after you calmed down, did he
7 take the cuffs off?

8 A Yes.

9 Q And then did he take you in the school?

10 A Yes.

11 Q And took you to your counselor?

12 A Yes.

13 Q And did you tell her what happened?

14 A No.

15 Q You didn't?

16 A No.

17 Q What did you say?

18 A Nothing.

19 Q And did you finish -- did you spend some
20 time with the counselor then?

21 A Yes.

22 Q And then did you go back to your classroom?

23 A Yes.

24 Q Later that day, do you remember seeing
25 Officer Ford?